# CITY OF SANTA BARBARA



## COUNCIL/PLANNING COMMISSION AGENDA REPORT

AGENDA DATE: March 27, 2008

**TO:** Mayor and Councilmembers & Planning Commission

**FROM:** Community Development Department, Planning Division

SUBJECT: Semi-Annual Joint Meeting, Planning Division Major Workload

Review

#### **RECOMMENDATION:**

That Council hold a joint work session with the Planning Commission to receive status reports and discuss major work program activities, underway and pending, in the Planning Division, including:

- A. Review of major workload priorities in the following programs Design Review and Historic Preservation; Zoning Information and Enforcement; Development Review; and Staff Hearing Officer, Environmental Review, and Training;
- B. Land Development Team (LDT) Fee Policy; and
- C. Regional Housing Needs Allocation (RHNA).

#### **EXECUTIVE SUMMARY:**

Joint work sessions with the Council and Planning Commission are scheduled by the Planning Division every six months for a briefing on the status of major projects, discussion of potential new issues and priorities, and to maintain a high level of communication. The Chairs of the Architectural Board of Review (ABR) and Historic Landmarks Commission (HLC) are invited as well. There may also be discussion of adjustments and priority changes made to the Division work program due to staff resource shifts, new assignments, and other factors.

#### **DISCUSSION:**

#### 1. PROGRAM OVERVIEWS

Programs to be presented for discussion will include lists of the major workload items and, to a lesser degree, information on regular daily and weekly activities such as design review agendas, plan check, Zoning Information Reports, counter services, and enforcement. However, providing and managing the range of public services that each

REVIEWED BY:	Finance	Attorney	

Agenda Item No.

program requires is important and demanding work. Efforts to address office and records management have been increasing due to the office improvement project, streaming video for Boards and Commissions, and public records requests. Staff is constantly working with others throughout the City organization and community to respond to concerns and to improve our work to ensure existing and new development complies with City policies and regulations.

A primary goal of the worksession is for Staff to communicate with the Council and Planning Commission to share a broad understanding of the multiple priorities and status of other important work that is active, pending, or on a back burner. Adjustments in priorities occur when issues heat up and efforts are made to improve a program, such as discussions with the Sign Committee and others on enforcement. The feedback from Council and Planning Commission received at these worksessions is very valuable for staying on track or making changes as necessary.

#### A. <u>Design Review & Historic Preservation Program</u>

Attachment 1 provides a list on the special assignments in this Program. In addition to managing three Board or Commission meetings every week, this Program has a number of important ordinance and guideline updates pending as well as the on-going Historic Resources and Preservation Work Program (HRWP). Staff would like to schedule a full review of the HRWP with the HLC and Council later this fiscal year to consider ways to increase the activity in this Program.

The preparation of new Design Guidelines for the Upper State Street area was postponed and is currently not funded in FY08 or FY09 budgets. Progress on other updates (for example EPV, antennas, etc.) will be done within existing budgets and staff resources, and, therefore, they take a fair amount of time and get shifted from time to time due to other priorities.

#### B. Zoning, Information, and Enforcement Program

Attachment 2 provides an overview of the primary work performed by this Program. Staff in this section has undergone some reductions through re-assignments to the new Staff Hearing Officer, Environmental Review and Training (SET) Program discussed below, and the section has also assumed the responsibilities for staffing the Sign Committee. An active priority currently is the "Round One" of Zoning Ordinance Amendments (ZOA), and we hope to complete that effort this fiscal year. Work on subsequent ZOA rounds now has a status of In-Active given the staff changes and limitations. A number of initiatives to improve enforcement with 1.5 FTE and a part-time hourly position are underway.

#### C. <u>Development Review Program</u>

Attachment 3 is a list of 26 projects which represents the more significant projects currently in the Land Development Team (LDT) process. A number of projects involve EIRs, some include zone changes, Specific Plans, and a host of land use and environmental concerns. The LDT remains very busy working through the process, although recently the Planning Commission agendas have had fewer items, and we believe the number of projects overall are likely to be affected by changes in the economy.

Other efforts associated with the LDT:

- Responding to Bureaucracy Busters recommendations regarding process.
- Inter-departmental efforts to adopt and implement new Best Management Practices and other sustainable programs/requirements.
- Replacement for the Development Review Senior Planner to retire in September 2008.

# D. Staff Hearing Officer, Environmental Review and Training (SET) Program

In July 2007, a new Section was created in the Planning Division. During the past six months, the SET Section has been transitioning into its new roles and establishing its priorities and goals.

The focus of the SET Section during the next year will be to:

- Train the new Environmental Analyst on the administration of the City's environmental review process.
- Complete second year review of the Staff Hearing Officer duties, present report to Planning Commission, and assume the role of the Staff Hearing Officer.
- Assist with a new "Guide to the Review Process" outreach and handout.
- Complete a work program for a comprehensive training program for Planning Division Staff.
- Strengthen the Planning Division by conducting 30 training sessions for new and existing Planning Division staff members on topics including: environmental review (procedures and resources for conducting environmental assessments, use of our new Initial Study checklist, review of technical studies, etc.); post-Planning Commission permitting and recording responsibilities; Development Review case planner support for application review; noticing procedures; etc.

#### 2. THE LAND DEVELOPMENT TEAM (LDT)

The Community Development Department charges a range of fees for the Land Development Team (LDT) review process (subdivisions, condominiums, coastal permits, etc.) and for various services and reviews in the Planning Division (Zoning

Information Reports [ZIRs], Architectural Board of Review [ABR], Historic Landmarks Commission [HLC], etc.).

Over the last several years, the City has been evaluating the fee structure based on a comprehensive fee study and policy direction from City Council on the balance between cost recovery and subsidy to support community planning. Historically, the City has kept fees low in part to offset public acceptance of the extensive review process. A cost recovery goal for most LDT services was set for 30%; some services, such as Appeals, Signs, and Conditional Use Permits, are less than 30%.

Over the past five years, we have significantly increased our Planning and LDT fees each and every year to achieve the 30% recovery level. Based on the recent analysis of the time/fee study, and the estimates included in the FY09 budget, the General Fund would still be subsidizing close to 86% of the cost of providing these services (for all LDT departments). The fee rates vary and revenues are only estimated, such that the actual cost recovery and subsidy percentages can be off the 30% and 70% targets. When the City collects less than expected and budget conditions are not favorable, the issue of re-visiting the fees is raised.

Many jurisdictions, including the County of Santa Barbara and the City of Goleta, charge full cost recovery for their Planning fees. Historically, the City of Santa Barbara has not charged full cost recovery, recognizing the time and effort involved in our review process with multiple Boards and Commissions, public involvement, and thorough staff reviews. As discussed with City Council during last year's budget hearings, there may be interest in changing the cost recovery goal from 30% to 50%. Staff suggests that before such changes are made, a full discussion should involve all the Boards and Commissions, the general public, and LDT applicants. The opinions likely to be expressed in such a discussion will range from a City management perspective that such increases are necessary to maintain existing staff levels and avoid staff reductions, to applicants expecting increased and faster service.

#### 3. THE RHNA PROCESS

The Regional Housing Needs Allocation (RHNA) process is well underway and this meeting provides a good opportunity to update the full Council and Planning Commission on the City's continuing role as an active member of the Santa Barbara Association of Governments (SBCAG) Board and Technical Planning Advisory Committee (TPAC). Important issues and concerns have emerged in determining the methodology, assumptions, and outcomes in terms of the number of housing units that the City and all the jurisdictions in the County will need to be addressed in the next cycle of Housing Element Updates.

The Mayor is the City's representative to the SBCAG Board and, with assistance from Staff, the Mayor sent the SBCAG Board a letter on March 19, 2008, expressing our major concerns with the RHNA process to date, the proposed outcomes, and larger policy issues raised by the County of Santa Barbara Planning Staff's position papers on the jobs/housing balance approach for the County and South Coast (Attachment 4).

The SBCAG Board meeting for March 20, 2008 includes a public hearing and recommendation to proceed with the RHNA process. At the time this Council Agenda Report was prepared, the outcome of the SBCAG meeting was not known. As the process continues, Staff will be scheduling formal hearings before the Council to review and comment on the draft RHNA policy and to officially respond as necessary.

#### **RECOMMENDATION:**

Staff will make presentations on each of the three topics included in this report. It is recommended that the Council and Planning Commission engage in discussion and provide feedback as necessary for Staff to proceed with the identified priorities.

#### **BUDGET/FINANCIAL INFORMATION:**

The purpose of the worksession is for information updates on the status of major work programs. If Council direction or allocation of funds is necessary for the projects, then the Council action will be scheduled at a regular Council meeting.

#### ATTACHMENTS:

- 1. Design Review & Historic Preservation Special Assignments
- 2. Zoning Program Overview
- 3. Partial Project List in LDT
- 4. Letter and exhibit for SBCAG regarding RHNA

PREPARED BY: Bettie Weiss, City Planner

**SUBMITTED BY:** David Gustafson, Acting Community Development Director

**APPROVED BY:** City Administrator's Office

# Design Review & Historic Preservation Special Work Assignments as of March 2008

#### NPO Update & Design Rev. Boards

#### Active:

- Single Family Residence Design Guidelines Update-Clean up
- Update NPO handouts, appeals & expiration of approvals

#### Pending:

- Update Handouts, Statistics Forms & Application Materials
- Application In-Take Appointments
- NPO Assessment for 2 Year Review due 2009

# Compatibility Findings-/Consideration- Underway

#### Active:

- Ordinance Committee one discussion held, return with ordinance
- Council action to be scheduled after Ordinance Committee
- Implementation with Improved Communications

# <u>Historic Preservation Work Program (HPWP)</u>

#### Active:

- Financial/Preservation Incentives- Mills Act Ordinance Amendments at Ordinance Committee
- Revisions to the City's Potential List/MEA Lists
- Final Implementation of Lower Riviera and Waterfront Survey Recommendations

#### Pending:

- Council Report Overview of HPWP
- Citywide Historic Districting Plan & Guidelines
- Completion of Lower Riviera Historic Resources Survey Phases 2 & 3
- Designations

#### **Design Guidelines Updates**

#### Active:

■ El Pueblo Viejo Guidelines Update – in HLC Subcommittee, pending – public review, full HLC recommendation and Council adoption

#### Pending:

- Chapala Street Design Guidelines- Addendum
- Sign Ordinance Amendments & Sign Guideline Update
- Wireless Facility/Antenna Ordinance Amendments
- Outer State Street Design Guidelines (FY 09-10 or Post PlanSB)
- Multi-Family Design Guidelines (Post PlanSB)
- Haley/Milpas Design Manual Update (Post PlanSB)

# **Zoning Information and Enforcement Program Overview**

#### **Enforcement**

Neighborhood Improvement Task Force

Tree Enforcement Working Group

Sign Enforcement Process Improvements

Pro-active letters are in the process of being sent

Churches for banners

Arborists, landscapers, gardeners for tree pruning and removal

Homeowners and Condo Associations for tree pruning and removal

# **Pending**

Inside Santa Barbara Spot on Zoning Enforcement

Public Service Announcements on Radio and TV

More sweeps

More pro-active enforcement

#### Counter and Plan Check Services

Interdepartmental Counter Committee

#### Sign Committee

Application Intake Appointments Inside Santa Barbara story (done)

#### Pending:

Sign Sweeps

Sign Ordinance Amendments

Inflatables

Real Estate signs

Neon Signs clarification

**Temporary Signs** 

#### Staff Support to Staff Hearing Officer

Training staff to get more staff familiar with the process

- 14 pre-application and submittal appointments/wk
- 4 Modification requests heard bi-weekly (about the limit for one person) Appeals to PC and CC

#### Technology

GIS Technical Advisory Committee

Tidemark Advantage (permit tracking system) Working Group

Administer the 40% of Info Systems Staff position

Work with County Assessor's Office and Information Systems

## **Zoning Ordinance Amendments**

Active:

Medical Marijuana

Round 1 to be completed in FY08 – Yards

Rounds 2 and 3 – Pending/In-Active

Fences, Hedges, Walls and Screens

Home Occupation

Misc. Clean Up

# Pending/In-Active

TDAO Clean Up

Revise Condo Conversion Ordinance

**Property Maintenance Ordinance** 

Appeal procedures

Rezone split zoned parcels

Residential parking – Increase for large houses

Parking on driveways & interior setbacks

Accessory Buildings

Update lists of allowed uses in various zones

Regulate caterering tracks, hot dog stands, etc. more explicitly

Clarify rules for nonconforming parking

Revise Solar Access Ordinance

#### Partial List of Projects in LDT

## Scheduled for Planning Commission

- 1298 Coast Village Road (Mixed use project) at Planning Commission
- 601 E. Micheltorena Street (Cottage Workforce Housing) substantial conformance determination & ABR appeal
- 800 Santa Barbara Street (mixed use @ De la Guerra) scheduled for Planning Commission
- 210 W. Carrillo Street (Radio Square; mixed use) revised Neg Dec and pending PC decision

#### **Environmental Review**

- 3735-3757 State Street (Whole Foods/Circuit City; mixed use) Environmental review
- 3714 State Street (Sandman Inn; hotel replacement/residential) Environmental Review
- 900-1100 Las Positas Road (Veronica Meadows: residential/annexation) Revisions to EIR
- 210 W. Carrillo Street (Radio Square; mixed use) revisions to Neg Dec and pending PC decision
- 1837 1/2 El Camino de la Luz (single family home) EIR
- 101 Garden Street, 216 Santa Barbara Street & 211 E. Yanonali Street (Paseo de la Playa; residential/commercial) - EIR
- 535 E. Montecito Street (Los Portales; price-restricted residential) Draft EIR pending
- Elings Park EIR scoping

#### Pending

- 900 Calle de los Amigos (Valle Verde Retirement facility) application incomplete
- Meigs Rd. & School District Revised Project, Rezone & LCP Amendment
- 1330 Chapala Street (Arlington Village; mixed use) PC concept on 3/6/08
- 630 Anacapa Street (Craviotto property; mixed use) pending PC concept
- 1900 Lasuen Rd. (El Encanto Hotel; Phase 2 renovations) pending application submittal
- 3887 State Street (State Street Lofts; mixed use) revised application pending
- West Beach Pedestrian Improvements application pending
- 1235 Veronica Springs Road (Hillside House; market & affordable housing) application resubmittal pending
- 15 S. Hope Avenue (Mixed use project) application pending
- 803 N. Milpas Street (Mixed use project) application pending
- Mission Creek Flood Control project individual CDPs

#### Construction Phase

- 433 E. Cabrillo Blvd. & 12 E. Montecito (Waterfront Hotel & Youth Hostel) building permits issued
- 35 State Street (La Entrada; time share) under construction
- Hwy 101 Operational Improvements construction starts next year





# City of Santa Barbara

City Council

www.SantaBarbaraCA.gov

Marty Blum Mayor

March 18, 2008

Dale Francisco Council Member

SBCAG Board of Directors Supervisor Brooks Firestone, SBCAG Chair 260 North San Antonio Road, Suite B Santa Barbara, CA 93110

Council Member Roger L. Horton

Iya G. Falcone

RE: REGIONAL HOUSING NEEDS - March 20, 2008 - Item #10

Helene Schneider Council Member

Council Member

Dear Chair Firestone & SBCAG Board:

Grant House Council Member

On March 20, 2008, the Santa Barbara County Association of Governments (SBCAG) will be considering a recommendation on how to allocate the regional housing need for the 2007- 2014 planning period. The City of Santa Barbara has concerns with the allocation process being recommended.

Das Williams Council Member

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City Hall PO Box 1990 Santa Barbara, CA

93102-1990

City of Santa Barbara Planning Staff actively participated on TPAC as the committee developed the recommended RHNA methodology. expressed on the committee, we have major concerns with the significant regional land use policy "paradigm shift" that is reflected in the TPAC recommended RHNA methodology as well as the County's RHNA proposals. Attached to this letter is additional RHNA information, as well as pie charts that illustrate the De La Guerra Plaza significance and magnitude of the changes being proposed.

> Simply put, the proposal before the SBCAG Board represents a major policy shift regarding land use and regional planning - especially in the South County. The 2008 TPAC proposal assigns 15% of the RHNA units to unincorporated areas and 85% to cities. The previous 2002 RHNA assigned 35% of the units to unincorporated areas throughout the County and 65% to cities. support the shift of units to cities, but we question the magnitude of the shift from past policies and practices.

> With respect to the South County, the City supports adjustments to the RHNA that shift more housing to the jobs-rich South County. Again however, we question the magnitude of the shift. In 2002, the South County was assigned 34% of the RHNA. The TPAC proposal increases the South County allocation to 47% of the countywide RHNA total.

March 18, 2008 Supervisor Brooks Firestone, SBCAG Chair Page 2-

Our strongest objections involve how the TPAC-proposed RHNA is distributed among the South County jurisdictions – predominantly to the 3 cities (89%) and a very small proportion to the South County unincorporated areas (11%). In 2002, 80% of the units were assigned to cities and 20% to the unincorporated areas.

Since the 1970's, the City's General Plan, as well as the Impacts of Growth Study and numerous other studies, have recognized that the South Coast functions as one region, especially with respect to economic, environmental and cultural issues. It is clearly one market with respect to jobs and housing. Nearly every study has concluded that our problems are regional and merit regional solutions. The proposed TPAC methodology departs from such previous approaches and does not take into account how our region functions.

During the 2002 RHNA process, a critical consideration in assigning units was the local general and community plans. With the exception of the City of Goleta, no other jurisdiction was assigned a RHNA greater than the units allowed by local plans and policies. The 2008 TPAC proposal assigns the City of Santa Barbara a RHNA that is nearly 150% of the City's existing General Plan capacity. No other jurisdiction's RHNA comes close to 100% of local plans. Please see the final chart in the attachment for an illustration of this.

It is our hope that the SBCAG Board will take a close look at the magnitude and significance of the proposed shift in how the RHNA is being allocated. We strongly urge the SBCAG Board to modify the TPAC proposal to be more consistent with the past methodologies based on jurisdiction's accepting a fair share as well as regional solutions to the RHNA obligation or postpone action on it to allow more considered input.

Sincerely.

Grant House, Mayor ProTempore

City of Santa Barbara

Attachment: 2008 RHNA PROCESS – Additional Information & Charts

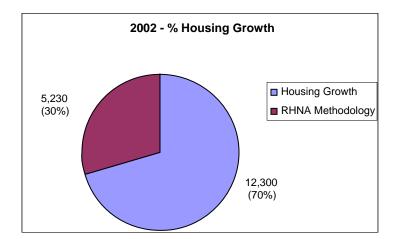
Cc:

Mayor and Council
Jim Armstrong, City Administrator
Dave Gustafson, Acting Community Development Director

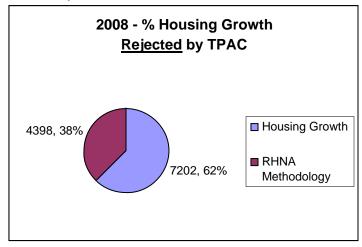
# 2008 RHNA PROCESS Additional Information & Charts City of Santa Barbara Planning Division March 18, 2008

# **Housing Growth**

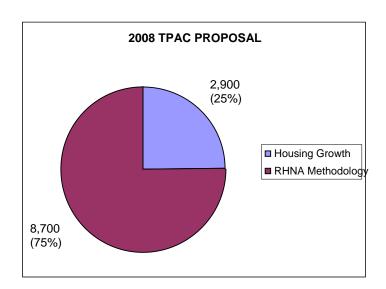
- The RHNA methodology proposed by the SBCAG Technical Planning Advisory Committee (TPAC) represents a significant change from all previous allocations. Historically, upon receiving the countywide RHNA from the State, Step 1 had always been to subtract out the <u>housing growth</u>. These are housing units that jurisdictions expect to be built over the next 7 years as reported in the Regional Growth Forecast (RGF). Then, the RHNA methodology was applied to the remaining units.
- In 2002, 70% of the countywide RHNA (12,300 units) was accounted for by development already anticipated and planned for in the Regional Growth Forecast and 30% on existing jobs.



• In 2008, RGF Housing growth <u>could potentially</u> account for 7,202 units of the countywide 11,600 RHNA.



- Many other areas in the State (5 out of 8 Council of Governments), base 100% of their RHNA distribution on housing growth.
- On January 23, 2008, TPAC rejected the Step 1 housing growth subtraction as "status quo" and unacceptable. Location of jobs was determined to be dominant factor (75%) for the RHNA methodology. Housing growth would account for only 25%.



#### Job Growth

- The recommended TPAC 2008 RHNA methodology shifted strongly to jobs and job growth based on the projections in the RGF.
- TPAC 2008 recommendation is based 75% on jobs (50% existing jobs, 25% job growth and 25% housing growth). The RHNA methodology is applied to the entire 11,600 units. County and City of Santa Barbara TPAC representatives voted against the recommendation for opposite reasons. The County representative said it was based too much on housing growth; the City representative said it was based too little on housing growth.
- The County proposal was even more jobs-focused. The County proposed a RHNA methodology based 90% on jobs (80% future jobs, 10% existing jobs, 10% future housing). On the South Coast, this proposal would result in 215 units allocated to the unincorporated areas, 287 for Carpinteria City, 1,400 for Goleta City and nearly 3,000 for the City of Santa Barbara.

- The Regional Growth Forecast includes some employment forecast estimates that need further review and analysis. For example, for the RHNA planning period (2007-2014):
  - City of Santa Barbara is projected to add 4,177 new jobs.
  - Unincorporated South Coast (including UCSB, Isla Vista, Montecito, East. Goleta Valley) is projected to add 161 over the same time period.
  - Carpinteria City 383 new jobs
  - Goleta City 1,940 new jobs
- For the 2005-2040 timeframe, the RGF projects the City to add **9,861** jobs. The County unincorporated areas add **382**.

#### **Jobs / Housing Balance Ratio**

- Applying a jobs/housing balance formula by political boundaries is not a productive way of looking at the actual circumstances on the South Coast.
- Based on a jobs/housing analysis that the County staff prepared (Feb 27<sup>th</sup> letter to TPAC), the County indicates that: "...there are jurisdictional differences that impact the demand for housing." The County also asserts that there are significant housing deficiencies in cities but that the County unincorporated areas have an "overall surplus of 18,307 houses." Table A of the County letter entitled "Housing Units Needed in Local Jurisdictions to House Workforce," contains the following information:
  - City of Santa Barbara = 23,609 units
  - City of Carpinteria = 1,097 units
  - City of Goleta = 9,211 units
  - County unincorporated areas = 0 units
- All previous RHNA allocations, the ECP Regional Growth Study, and the 1970's Impacts of Growth Study concluded that the South Coast is one geographic and economic region, especially with respect to housing and jobs.
- Given market demands, the cost of new housing on the South Coast is for the most part beyond the reach of the majority of the workforce. A RHNA methodology that directs 75% or more units to address job growth, and to presumably provide or meet workforce housing needs, is not practical. Only a small fraction of the new units would be affordable to workers.

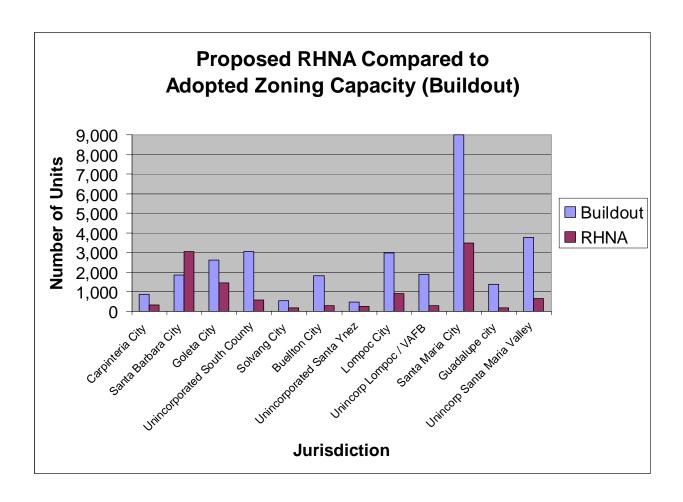
# **State Housing Law**

- County staff has indicated that it believes that Housing Element law is an economic development plan to house workers and that the RHNA methodology should focus on that.
- City staff contends that State Housing Element law is based on providing housing for the State's growing population, with a focus on distributing the fair share of housing by type, tenure and affordability among jurisdictions in a region, including County areas. SBCAG staff has supported that interpretation.

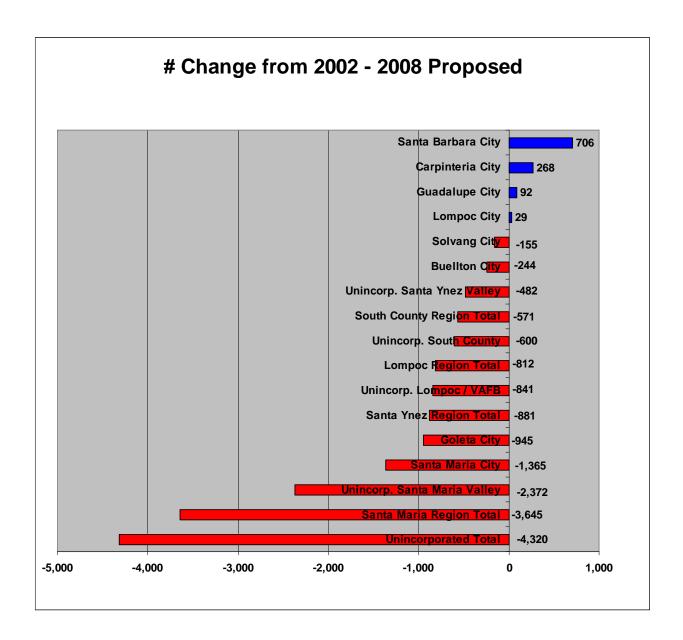
# The RHNA "Number" for the City of Santa Barbara

- The TPAC proposed RHNA methodology assigns the City of Santa Barbara an allocation that is nearly 150% of remaining residential buildout capacity in General Plan.
- No other city or unincorporated area is assigned anything even approaching buildout under current plans. Next closest: unincorporated Santa Ynez Valley (288 units RHNA / 470 units remaining to buildout) and Goleta City at 53% (1,355 units RHNA / 2,619 units remaining to buildout).

- Even though the Countywide total issued to us from HCD is nearly 6,000 units less than in 2002, this reduction in regional housing need is not fairly shared among jurisdictions with respect to existing residential zoning capacity or in comparison bo the 2002 RHNA.
- From the chart below, it is clear that every jurisdiction has the land and zoning capacity already to meet the RHNA. Only the City of Santa Barbara, a built-out city with very little remaining vacant land is given a RHNA well over our existing General Plan capacities.
- As determined by the State, RHNA is about showing land inventory and zoning capacity and not necessarily building the units.

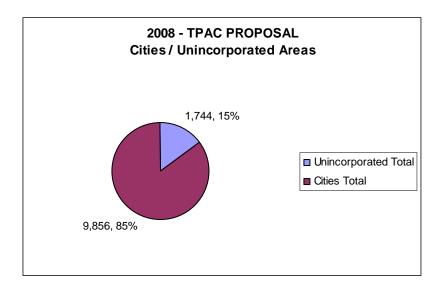


• In the TPAC proposal, every jurisdiction experiences a sizable reduction in units to plan for with the exception of 4 jurisdictions. The magnitude of increase is most significant for the cities of Santa Barbara and Carpinteria.

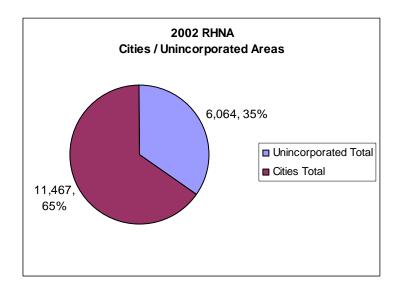


# Significant Land Use / Regional Policy Issues

• The 2008 TPAC proposal assigns 15% of the RHNA units to unincorporated areas and 85% to cities.

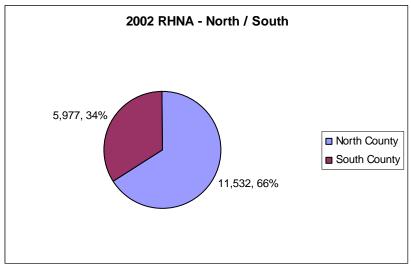


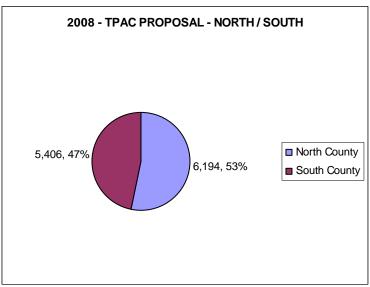
• The previous 2002 RHNA assigned 35% of the units to unincorporated areas throughout the County and 65% to cities.



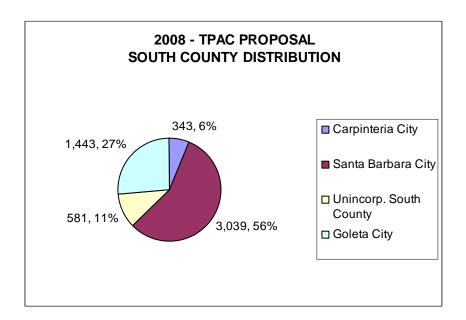
# 2008 RHNA Process – Additional Information March 14, 2008 - Page 8 of 10

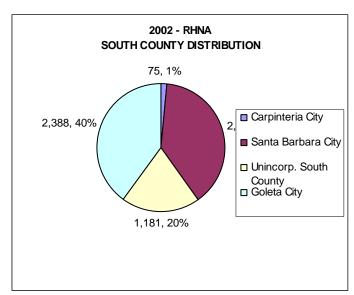
• In 2002, the South County was assigned 34% of the RHNA. The TPAC proposal increases the South County allocation to 47% of the countywide RHNA total.





 The South County functions as one region. The housing needs of the South Coast workforce needs to be fairly shared by all jurisdictions on the South Coast, not just the cities.





# Other Methodologies Considered

 At the March 12, 2008, TPAC meeting, there was a discussion between the cities of Carpinteria, Santa Barbara and Goleta about a distribution of the South County units that would be more reflective of past methodologies. The County made it clear that the County would not support that consideration, and the discussion was dropped.

# 2008 RHNA Process – Additional Information March 14, 2008 - Page 10 of 10

 SBCAG Staff proposed a RHNA methodology that allocated above-moderate market rate RHNA units based on where housing is under construction or already approved. The remaining 6,844 units aimed at low and moderate income households would have been allocated based on the jobs/housing formula. Unfortunately, this option was not discussed by TPAC.